

EXHIBIT A

Richard Kadrey *et al.* v. Meta Platforms, Inc.
Case No.: 3:23-cv-03417-VC-TSH

Cross-referenced summary of motion(s) to seal

I. Documents filed by Plaintiffs relating to Dkts. 262, 472, 517, 588

Document title/description	Dkt. No. of redacted version	Dkt. No. of unredacted version	Dkt. No. of statement in support of sealing	Party with burden to substantiate need to seal	Full or partial sealing sought	Brief statement of reason for sealing	Granted? (leave blank)
M. Kambadur Deposition Transcript (September 17, 2024)	331-2	260-6	282	Defendant	Partial	Contains discussion of Meta's highly sensitive business strategies; contains technical information regarding Meta's AI model development.	
Meta's Amended Non-Email Privilege Log	331-3	260-7	282	Defendant	Partial	Contains significant discussion and description of Meta's highly confidential internal communications.	
Meta's Amended Email Privilege Log	331-4	260-8	282	Defendant	Partial	Contains significant discussion and description of Meta's highly confidential internal communications, including personal identifying information, such as employee email addresses.	

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Declaration of Matthew Butterick ISO Plaintiffs' Reply	567-1	523-1	567	Defendant	Partial	Contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Exhibit A to Declaration of Matthew Butterick ISO Plaintiffs' Reply	567-2	523-2	567	Defendant	Partial	Contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta's Supplemental Interrogatory Response to Plaintiff's Interrogatory No. 1 (December 13, 2024)	567-3	473-5	567	Defendant	Partial	Contains Meta's nonpublic and highly confidential financial information and internal considerations, including information concerning Meta's budgets, costs, estimated revenues, and other financial forecasts; contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships); contains Meta's highly sensitive, confidential, technical, and trade secret information, such as details about computational resources and hardware configurations.	

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Meta Internal Spreadsheet on Billing Data	N/A	473-6	567	Defendant	Full	Contains billing data between Meta and a third-party that discloses pricing information which would reveal the monetary terms of an agreement with a third-party vendor.	
Meta Internal GenAI Opportunities Documentation	N/A	473-7	567	Defendant	Full	Contains Meta's internal highly confidential and competitively sensitive long range planning and financial modeling, including information concerning Meta's ongoing and future monetization efforts. Information is interwoven throughout the exhibit making redactions inadequate.	
Meta Internal GenAI Research Overview Documentation	567-4	473-8	567	Defendant	Partial	Contains Meta's highly sensitive, confidential, technical, and trade secret information, for example, details about computational resources and hardware configurations.	

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Meta Internal Llama Branding and Launch Requirements Documentation	567-5	473-9	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal GenAI Initiative Documentation	N/A	473-11	567	Defendant	Full	Contains Meta's internal and competitively sensitive financial metrics for 2025, such as budget line items and key drivers associated with specific projects or ventures. This nonpublic and highly confidential financial information and internal strategic considerations include information concerning ongoing and future initiatives, as well as Meta's prioritization of these initiatives. Information is interwoven throughout the exhibit making redactions inadequate.	

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Meta Internal Chat Thread	567-6	473-12	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal LLM Dataset Considerations Documentation	567-7	473-14	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Chat Thread	567-8	473-15	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-9	473-16	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-10	473-17	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-11	473-18	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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E. Nho Deposition Transcript (December 6, 2024)	567-12	473-19	567	Defendant	Partial	Contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal LLM Training Documentation	567-13	473-21	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information such as details about Meta's proprietary datamix.	
Meta Internal Long Context LLM Documentation	567-14	473-22	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-15	473-23	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Chat Thread	567-16	473-24	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-17	473-25	567	Defendant	Partial	Contains Meta's staffing and personnel related information, namely, highly sensitive discussions about an individual's workplace performance.	
Opening Expert Report of C. Lopes (January 10, 2025)	567-18	473-26	567	Defendant	Partial	Contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships); contains Meta's highly sensitive, confidential, technical, and trade secret information such as details about Meta's proprietary datamix.	
Meta Internal Chat Thread	567-19	473-29	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	567-20	473-30	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Meta Internal Chat Thread	567-21	473-31	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-22	473-32	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Fair LLM Check-In Documentation	567-23	473-34	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Email Thread	567-24	473-35	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	567-25	473-36	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Meta Internal Chat Thread	567-26	473-37	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
D. Esiobu Deposition Transcript (December 13, 2024)	567-27	473-38	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	567-28	473-39	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-29	473-40	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Email Chain with Third Party	567-30	473-41	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Email Thread with Third Party	N/A	473-42	567	Defendant	Full	Contains communications with third parties concerning potential partnerships and licensing ventures.	

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Meta Internal Generative AI BD Pipeline Documentation	567-31	473-43	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Email Thread with Third Party	N/A	474-1	567	Defendant	Full	Contains communications with third parties concerning potential partnerships and licensing ventures.	
License Agreement with Third Party	N/A	474-2	567	Defendant	Full	Contains draft and finalized confidential agreements exchanged and entered into with third parties.	

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Meta Internal Chat Thread	567-32	474-3	567	Defendant	Partial	Contains Meta's employees' personal identifiable information; contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-33	474-4	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's nonpublic and highly confidential financial information and internal considerations, including information concerning Meta's budgets, costs, estimated revenues, and other financial forecasts; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding	
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						possible strategic partnerships).	

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Meta Internal Chat Thread	567-34	474-5	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's nonpublic and highly confidential financial information and internal considerations, including information concerning Meta's budgets, costs, estimated revenues, and other financial forecasts; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding	
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						possible strategic partnerships).	
A. Boesenberg Deposition Transcript (November 18, 2024)	567-35	474-6	567	Defendant	Partial	Contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Chat Thread	567-36	474-7	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	567-37	474-8	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-38	474-9	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Email Thread	567-39	474-10	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII).	

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Meta Internal Dataset Documentation	567-40	474-12	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-41	474-13	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-42	474-14	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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M. Sinkinson Deposition Transcript (March 4, 2025)	567-43	474-15	567	Defendant	Partial	Contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Chat Thread	567-44	474-16	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Email Thread	567-45	474-17	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Chat Thread	567-46	474-18	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII).	
Meta Internal Chat Thread	567-47	474-19	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII).	
Meta Internal Chat Thread	567-48	474-20	567	Defendant	Partial	Contains Meta's employees' personal identifiable information (PII).	

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Document title/description	Dkt. No. of redacted version	Dkt. No. of unredacted version	Dkt. No. of statement in support of sealing	Party with burden to substantiate need to seal	Full or partial sealing sought	Brief statement of reason for sealing	Granted? (leave blank)
Meta Internal Chat Thread	567-49	474-21	567	Defendant	Partial	Contains Meta's employees' personal identifiable information; contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	567-50	474-24	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	567-51	474-25	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Chat Thread	568-1	474-26	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Rebuttal Expert Report of Barbara Frederickson-Cross (February 10, 2025)	568-2	474-28	567	Defendant	Partial	Contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including source code commands and/or narrative descriptions of such commands.	

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Meta Internal Chat Thread	568-3	474-29	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Spreadsheet	568-4	474-31	567	Defendant	Partial	Contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Email Thread	568-5	474-36	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Meta Internal Chat Thread	568-6	474-37	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Chat Thread	568-7	474-40	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	568-8	474-41	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	568-9	475-3	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including source code commands and/or narrative descriptions of such commands.	

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Opening Expert Report of Dr. Jonathan L. Krein (January 10, 2025)	568-10	475-4	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Internal Chat Thread	568-11	475-5	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	568-12	475-7	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships); contains Meta's highly sensitive, confidential, technical, and trade secret information, including details about computational resources and hardware configurations.	
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Meta Internal Dataset Documentation	568-13	520-3	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	568-14	520-5	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Dataset Documentation	568-15	520-7	567	Defendant	Partial	Contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including source code commands and/or narrative descriptions of such commands and detailed evaluation results such as numeric metrics.	

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N. Bashlykov 30(b)(1) Deposition Transcript (December 5, 2024)	568-16	520-8	567	Defendant	Partial	Contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Chat Thread	568-17	520-10	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Meta Internal Chat Thread	568-18	520-11	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	568-19	520-12	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Chat Thread	568-20	520-13	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	568-21	520-14	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Dataset Documentation	568-22	520-16	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Meta Internal Chat Thread	568-23	520-17	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains Meta's highly sensitive, confidential, technical, and trade secret information, including detailed evaluation results such as numeric metrics.	

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Translation of Meta Internal Chat Thread	568-24	520-20	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including source code commands and/or narrative descriptions of such commands.	

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Meta Internal Dataset Documentation	568-25	520-23	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including highly detailed technical information about datasets used internally at Meta in connection with its Llama models, including for training and conducting research and experiments; this information includes details about the compositions of particular datasets including token counts or volumes and data mixes, internal experiments conducted and results obtained using such	
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						datasets, and information about the processing of these datasets.	
Meta Internal Chat Thread	568-26	520-24	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	
Meta Presentation on Memorization in LLMs	568-27	520-25	567	Defendant	Partial	Contains Meta's highly sensitive, confidential, technical, and trade secret information, including detailed evaluation results such as numeric metrics.	

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Meta Internal Memorization Documentation	568-28	520-27	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including Meta's data extraction methodology, results, and prompt sampling approaches.	

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Meta Internal Generative AI Roadmap Documentation	568-29	520-28	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships); contains Meta's highly sensitive, confidential, technical, and trade secret information, including details about computational resources and hardware configurations.	

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Expert Report of Daniel F. Spulber (January 10, 2025)	568-30	520-32	567	Defendant	Partial	Contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
License Agreement with Third Party	N/A	520-33	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	
License Agreement with Third Party	N/A	520-34	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	
License Agreement with Third Party	N/A	521-1	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	
License Agreement with Third Party	N/A	521-2	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	

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License Agreement with Third Party	N/A	521-3	567	Defendant	Full	Contains a finalized confidential agreement exchanged and entered into with a third party.	
License Agreement with Third Party	N/A	521-5	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	
License Agreement with Third Party	N/A	521-6	567	Defendant	Full	Contains a draft confidential agreement exchanged with a third party.	
Meta Internal Chat Thread	568-31	521-7	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Meta Internal Dataset Documentation	568-32	521-8	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

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Meta Internal Licensing Strategy Documentation	568-33	521-9	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	

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Email Thread with Third Party	N/A	522-3	567	Defendant	Full	Contains communications with third parties concerning potential partnerships and licensing ventures.	
Meta Internal Dataset Documentation	568-34	522-5	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's nonpublic and highly confidential financial information and internal considerations, including information concerning Meta's budgets, costs, estimated revenues, and other financial forecasts; contains information about Meta's proprietary data acquisition techniques.	

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Opening Expert Report of Jonathan L. Krein (January 10, 2025)	568-35	522-7	567	Defendant	Partial	Contains Meta's hyperlinks, file paths, and certain file names (e.g., links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains Meta's highly sensitive, confidential, technical, and trade secret information, including source code commands and/or narrative descriptions of such commands.	
Meta Internal Email Thread	568-36	522-9	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Chat Thread	568-37	522-10	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal GenAI Weekly Team Meeting Notes	N/A	522-13	567	Defendant	Full	Contains highly confidential internal weekly meeting notes of a Meta engineering team over a six-month period, which contain non-public granular technical information and references to third parties and potential partners.	

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Meta Internal Llama Documentation	568-38	522-15	567	Defendant	Partial	Contains Meta's nonpublic and highly confidential financial information and internal considerations, including information concerning Meta's internal pricing considerations, budgets, costs, estimated revenues, and other financial forecasts; contains confidential third-party identities and agreement terms subject to nondisclosure obligations, as well as sensitive and nonpublic information concerning Meta's business strategies and negotiations vis-à-vis third parties (including Meta's internal considerations regarding possible strategic partnerships).	
Meta Internal Chat Thread	568-39	522-17	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	

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Meta Internal Dataset Documentation	568-40	522-19	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII); contains Meta's highly sensitive, confidential, technical, and trade secret information, including details about Meta's proprietary datamix.	
Meta Internal Chat Thread	568-41	522-21	567	Defendant	Partial	Contains Meta employees' personal identifiable information (PII).	
Plaintiffs Slide Decks Presented at the May 1, 2025 Motion for Summary Judgment Hearing	588-1; 595-1	589-1	592; 593; 594; 595	Defendant and Third Party	Partial	Contains confidential third party information.	
Pritt Ex. 139	518-43	522-1	558	Third Party	Full	Contains confidential business and proprietary information of a third party.	

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II. Documents filed by Defendant relating to Dkts. 247, 489, 543

Document title/description	Dkt. No. of redacted version	Dkt. No. of unredacted version	Dkt. No. of statement in support of sealing	Party with burden to substantiate need to seal	Full or partial sealing sought	Brief statement of reason for sealing	Granted? (leave blank)
Letter from Plaintiffs Regarding Meta's Privilege Logs	330-1	246-14	246 and 246-1	Defendant	Partial	Contains significant discussions of Meta's confidential privilege log descriptions and associated communications.	
Ghajar Ex. 6 (Farnsworth Tr.)	490-6	497-8	563	Plaintiff	Partial	Contains Plaintiff's personal financial information and a third party's personally identifiable information (PII).	
Ghajar Ex. 6 (Greer Tr.)	490-6	497-8	563	Plaintiff	Partial	Contains Plaintiff's personal medical information.	
Ghajar Ex. 6 (Hwang Tr.)	490-6	497-8	563	Plaintiff	Partial	Contains Plaintiff's personal financial and medical information.	
Ghajar Ex. 10 (Woodson Tr.)	490-10	497-11	563	Plaintiff	Partial	Contains Plaintiff's personal financial information.	
Ghajar Ex. 17 (Golden Tr.)	490-17	497-16	563	Plaintiff	Partial	Contains Plaintiff's personal financial information.	

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Ghajar Ex. 17 (Klam Tr.)	490-17	497-16	563	Plaintiff	Partial	Contains Plaintiff's personal financial information.	
Ghajar Ex. 17 (Lippman Tr.)	490-17	497-16	563	Plaintiff	Partial	Contains Plaintiff's personal financial information.	
Ghajar Ex. 17 (Snyder Tr.)	490-17	497-16	563	Plaintiff	Partial	Contains Plaintiff's personal financial information.	
Opening Expert Report of Dr. Jonathan L. Krein (Jan. 10, 2025)	N/A ¹	497-18	497-1	Defendant	Partial	Contains hyperlinks and file paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems.	

¹ Defendant's partial redactions annotated in blue boxes in Dkt. 497-18. Document was filed entirely under seal to the extent plaintiff claimed confidentiality over remaining portions. *See* Dkt. 497-1 at ¶ 4.

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Case No.: 3:23-cv-03417-VC-TSH

Document title/description	Dkt. No. of redacted version	Dkt. No. of unredacted version	Dkt. No. of statement in support of sealing	Party with burden to substantiate need to seal	Full or partial sealing sought	Brief statement of reason for sealing	Granted? (leave blank)
A. Acharya Deposition Transcript (November 21, 2024)	490-26	497-19	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee); contains Meta's non-public and highly confidential financial information, such as nonpublic forecasts of revenues and allocation of costs associated with specific projects or ventures.	

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Exhibit 643 to the Acharya Deposition	490-27	497-20	497-1	Defendant	Partial	Contains Meta's non-public competitively sensitive financial information, such as nonpublic forecasts of revenues and costs associated with specific projects or ventures, as well as budget line items and key drivers. This nonpublic and highly confidential financial information and internal strategic considerations include information concerning ongoing and future initiatives, as well as Meta's prioritization of these initiatives.	

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A. Boesenberg Deposition Transcript (November 18, 2024)	490-30	497-21	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee); contains the monetary terms of an agreement with a third party, which is subject to confidentiality and non-disclosure obligations and agreements, and the identity of said third party.	
S. Choudhury Deposition Transcript (December 5, 2024)	490-31	497-22	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	
M. Clark Deposition Transcript (November 13, 2024)	490-34	497-23	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	

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S. Edunov Deposition Transcript (November 6, 2024)	490-38	497-24	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	
M. Kambadur Deposition Transcript (September 17, 2024)	490-40	497-25	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	
N. Chayak Deposition Transcript (October 31, 2024)	490-42	497-26	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	
J. Pineau Deposition Transcript (November 6, 2024)	490-44	497-27	497-1	Defendant	Partial	Contains Meta employees' personal identifiable information (the home address of an employee).	

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Meta's Supplemental Interrogatory Response to Plaintiff's Interrogatory No. 1 (December 13, 2024)	490-48	497-28	497-1	Defendant	Partial	Contains confidential information related to the identification of datasets used to train Llama models (datasets which are not alleged to contain Plaintiffs' works or otherwise at issue), which is competitively sensitive.	
Rebuttal Expert Report of Barbara Frederikson-Cross (February 10, 2025)	543-6	544-4	544-1	Defendant	Partial	Contains hyperlinks and file paths (<i>e.g.</i> , links to access Meta's internally stored documents and data) that point to Meta's confidential and proprietary information and sensitive features of its internal systems; contains highly confidential technical information, including source code, and descriptions and summaries of source code.	

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Document title/description	Dkt. No. of redacted version	Dkt. No. of unredacted version	Dkt. No. of statement in support of sealing	Party with burden to substantiate need to seal	Full or partial sealing sought	Brief statement of reason for sealing	Granted? (leave blank)
A. Boesenberg Deposition Transcript (November 18, 2024)	543-9	544-5	544-1	Defendant	Partial	Contains the identity of third parties (who are not parties to this lawsuit), where Meta has entered into and are subject to confidentiality and non-disclosure obligations and agreements, where these third parties obtained promises of confidentiality from Meta.	
S. Choudhury Deposition Transcript (December 5, 2024)	543-10	544-6	544-1	Defendant	Partial	Contains the identity of third parties (who are not parties to this lawsuit), where Meta has entered into and are subject to confidentiality and non-disclosure obligations and agreements, where these third parties obtained promises of confidentiality from Meta.	
M. Sinkinson Declaration (April 17, 2025)	543-15	544-9; 564-1	564	Third Party	Partial	Contains confidential third party information.	